

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Nicole McDaniels,

Debtor.

Case No. 21-13245-AMC
Chapter 13
Related to ECF No. 51

Objection to Motion for Relief from the Automatic Stay

Debtor Nicole McDaniels, by her attorney, objects to the Motion for Relief from the Automatic Stay filed by Movant Delaware County Tax Claim Bureau.

1. Relief from the stay is not necessary because the Debtor can cure the alleged arrearage through the chapter 13 plan.

2. The Motion fails to state grounds for relief in support of waiving the fourteen-day stay prescribed by Fed. R. Bankr. P. 4001(a)(3).

3. If the Court grants the Motion notwithstanding this objection, it must not grant relief further than modifying the automatic stay to permit the Movant to enforce its *in rem* rights under applicable nonbankruptcy law with respect to the property located at 59 Price Avenue. *See* 11 U.S.C. § 362 (c)(1).

For those reasons, the Court must enter relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: June 3, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: _____



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Certificate of Service

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: June 3, 2024



Mike Assad